

### **REMARKS**

Reconsideration of the application in view of the above amendments and following remarks is respectfully requested.

#### **Status of the Claims**

Claims 1 and 11 have been amended.

No new matter is added.

Claims 1-15 are pending in this application.

#### **Rejection Under 35 U.S.C. §102**

Claims 1-4 and 11-15 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 4,932,729 to Thompson et al. ("Thompson"). It is respectfully submitted that Thompson does not anticipate the presently claimed invention.

Independent claim 1 has been amended to recite a hinge arrangement for the front door of a cabinet comprising a front portion having a shoe that transfers the weight of the front door to the floor. It is respectfully submitted that Thompson does not suggest or disclose at least this feature of the presently claimed invention.

Thompson describes a refrigerator door hinge having a bracket member 44 and a hinge bracket 81. The bracket member 44 accommodates an enlarged support pad 72 and is attached to the base 21 of a refrigerator. The hinge bracket 81 includes a hinge pin 98 and is mounted to a front face 22. Further, "[i]t will be noted that with this construction the hinge pin 98 and hinge bracket 81 must support the entire load of the bottom door 14, and because of the cantilever construction of the hinge bracket, the load is transferred...to the bracket 44." Thompson, col. 6, lines 58-63. Accordingly, the "cantilever construction" of the Thompson hinge assembly provides that the force introduced by the weight of the door onto hinge bracket 81 is transferred to the bracket 44 as an upward force exerted on the bottom of the refrigerator.

In contrast, the presently claimed invention describes a hinge arrangement having a front portion that includes a shoe that transfers the weight of the front door to the floor. Transferring the

load of the door to the floor via the enlarged support pad 72, which the Examiner compares to the shoe of the present invention, is impossible given the design of the Thompson hinge. The Thompson hinge operates in an entirely opposite manner, where the “cantilever construction” transfers the load of the door as an upward force on the bottom of the refrigerator base 21, lessening the load on the enlarged support pad 72.

Accordingly, for at least the reasons discussed above, Applicants respectfully submit that Thompson does not anticipate claim 1, and respectfully request that the rejection of claim 1 under 35 U.S.C. §102(b) be withdrawn.

Claims 2-4 and 11-15 depend from claim 1. Accordingly, for at least the reasons discussed above, Applicants respectfully submit that Thompson does not anticipate claims 2-4 and 11-15, and respectfully request that the rejection of claims 2-4 and 11-15 under 35 U.S.C. §102(b) be withdrawn.

### **Rejection Under 35 U.S.C. §103**

Claims 5-10 are rejected under 35 U.S.C. §103(a) as being unpatentable over Thompson and further in view of U.S. Patent No. 5,215,367 to Montuoro et al. (“Montuoro”).

Claims 5-10 depend from claim 1, and Montuoro does not cure the deficiencies of Thompson. Accordingly, for at least the reasons described above, Applicants respectfully request that the rejection of claims 5-10 under 35 U.S.C. §103(a) be withdrawn.

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

The Examiner is respectfully requested to contact the undersigned at the telephone number indicated below if the Examiner believes any issues can be resolved through either a Supplemental Response or an Examiner's Amendment. In view of the above amendment, Applicants believe the pending application is in condition for allowance.

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Respectfully submitted,

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